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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

11 LLOYD'S OF LONDON SYNDICATE) No. 2:23-cv-1497
12 2987,)
13 Plaintiff,)
14 v.)
15 PCL HOMES, LLC, a Washington Limited)
16 Liability Company, and ESTATE OF JOSE)
17 TRINIDAD MEDRANO-VILLAGRAN, by)
and through its Administrator, NOVEMA)
APRIL MEDRANO;)
Defendants.)
PLAINTIFF'S SUBMISSION IN
RESPONSE TO ORDER TO SHOW
CAUSE (DKT. 12) AND NOTICE OF
VOLUNTARY DISMISSAL WITHOUT
PREJUDICE AND WITHOUT COSTS
PURSUANT TO FED. R. CIV. P.
41(a)(1)(A)(i)

INTRODUCTION AND RELIEF REQUESTED

20 Plaintiff Lloyd's of London Syndicate 2987 submits this response to the Court's Order to
21 Show Cause of November 8, 2023. Dkt. 12. This Court observed in its Order that Defendant PCL
22 Homes, LLC's amended corporate disclosure statement confirmed that the limited liability company
23 has a member, Remix Investments, Inc., that is a Washington corporation but maintains its principal
24 place of business in Canada. The Court's order also noted that because Plaintiff is a citizen of
25 England and a member of Defendant PCL Homes, LLC is a citizen of Canada, the case falls outside
26 the scope of federal subject matter jurisdiction under 28 U.S.C. § 1332. Dkt. 12 at 2.

PLAINTIFF'S SUBMISSION IN RESPONSE TO ORDER TO SHOW CAUSE (DKT. 12) AND NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AND WITHOUT COSTS PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(i) - 1

MURPHY ARMSTRONG & FELTON LLP
719 Second Avenue
Suite 701
Seattle, WA 98104
T/206-985-9770 F/206-985-9790

1 Plaintiff acknowledges the Court's concerns as to subject matter jurisdiction. Pursuant to
 2 Fed.R.Civ.P. 41(a)(1)(A)(i), Plaintiff submits this voluntary notice of dismissal of its claims in this
 3 action without prejudice and without an Order of the Court. Plaintiff has not previously dismissed any
 4 federal or state court action based on or including the same claims at issue. Plaintiff's notice of
 5 dismissal is without fees or costs to any party.
 6

7 Plaintiff initiated this action on September 26, 2023. As of the date of this submission, none of
 8 the Defendants have filed an answer or a motion for summary judgment.
 9

10 DATED this 15th day of November, 2023.
 11

12 MURPHY ARMSTRONG & FELTON LLP
 13

14 By: /s/ James P. Murphy
 15 James P. Murphy, WSBA #18125
 719 Second Avenue, Suite 701
 16 Seattle, WA 98104
 T/206.985.9770 F/206.985.9790
 17 jpm@maflegal.com
 18

19 *Attorneys for Plaintiff*
 20 *Lloyd's London Syndicate 2987*
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 23
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CERTIFICATE OF SERVICE

I hereby certify and declare that on November 15, 2023, I electronically filed the foregoing:

1. PLAINTIFF'S SUBMISSION IN RESPONSE TO ORDER TO SHOW CAUSE (DKT.12) AND NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AND WITHOUT COSTS PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(i).

with the Clerk of the Court through the CM/ECF system, which will send notification to the following counsel:

Thomas M. William
Harper | Hayes PLLC
1200 Fifth Avenue, Suite 1208
Seattle, Washington 98101
T/206.340.8010
twilliams@harperhayes.com

Attorneys for PCL Homes, LLC

I also certify and declare that on November 15, 2023, I sent a copy of this document via US mail and via electronic mail to the following counsel:

W. Tracy Codd
W. Tracy Codd, Attorney at Law, P.C.
P.O. Box 1238
Seahurst, Washington 98062-1238
T/206.451.2349
wtcodd@comcast.net

*Attorneys for Estate of Jose
Trinidad Medrano-Villagran*

DATED at Seattle, Washington, this 15th day of November, 2023.

By: /s/ Angelina Hernandez
Angelina Hernandez, Paralegal